

In re Patent Application of:

**DELLMO ET AL.**

Serial No. **10/806,668**

Filing Date: **March 23, 2004**

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#### REMARKS

The Examiner is thanked for the thorough examination of the present application. Independent Claims 1, 11, 21, 25, and 29 have been amended to further define over the prior art. Support for the amendments can be found in paragraphs 0034-0037 of the specification, for example. No new matter is being added. The patentability of the claims is discussed below.

#### I. The Claimed Invention

The present invention is directed to a cryptographic device. As recited in amended independent Claim 1, for example, the device includes a cryptographic module and a communications module removably coupled thereto. The cryptographic module includes a first housing, a user Local Area Network (LAN) interface carried by the first housing and including a plurality of different connectors for coupling the cryptographic module to different network devices, and a cryptographic processor carried by the first housing and coupled to the user LAN interface. Furthermore, the communications module includes a second housing and a network wireless LAN interface carried by the second housing coupled to the cryptographic processor and switchable between wireless LAN modes. Independent Claim 1 has been amended to recite the user LAN interface includes a plurality of different connectors for coupling the cryptographic module to different network devices.

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Amended independent Claim 11 is directed to a similar cryptographic device, and amended independent Claims 21 and 25 are directed to related methods. Amended independent Claim 29 is directed to a related communications system. Independent Claims 11, 21, 25, and 29 have been amended similar to amended independent Claim 1.

## **II. The Claims Are Patentable**

The Examiner rejected independent Claims 1, 11, 21, 25, and 29 over Dhir et al. in view of Cheng. Dhir et al. is directed to a programmable integrated circuit, namely a field programmable gate array (FPGA), that can be used to handle different wireless local area network (WLAN) communication specifications. The integrated circuit includes a transceiver coupled to programmable gates, memory coupled to the programmable gates for storing instructions for programming a first portion of the programmable gates with a selected one of a first type of a medium access layer and a second type of a medium access layer. The first type of the medium access layer is different from the second type of medium access layer, though both the first type of the medium access layer and the second type of the media access layer are compatible with the transceiver. The memory is configured for storing instructions for programming a second portion of the programmable gates as a baseband controller. See, e.g., col. 2, lines 14-49 of Dhir et al.

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While the Examiner correctly acknowledges that Dhir et al. fails to teach a cryptographic module and a communications module that are removably coupled to one another, the Examiner contends that Chen provides these critical deficiencies. Chen is directed to an add-on card for a computer that is detachable from the computer and allows the computer to communicate with both wired and wireless networks. The add-on card includes an access control circuit, volatile and non-volatile memory, a wireless transmission module, and a network connection module. The network connection module has both an antenna for communicating with a wireless network, and a standard network cable port for connecting to a wired network. See, e.g., paragraphs 0009-0010 of Chen.

Applicants submit that even a selective combination of the prior art references fail to disclose the claimed invention as recited in amended independent Claims 1, 11, 21, 25, and 29. Amended independent Claims 1, 11, 21, 25, and 29 recite the user Local Area Network (LAN) interface carried by the first housing and comprising a plurality of different connectors for connecting the cryptographic module to different network devices. In contrast, Cheng discloses a PCMCIA card including a single connection port to be connected inside a PCMCIA slot of a computer. In other words, Cheng can only connect to a network device via the PCMCIA connection, while, the claimed invention, as recited in amended independent Claims 1, 11, 21, 25, and 29, for example, can connect using a plurality of different

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connectors. Using a plurality of different connectors advantageously allows quick configuration of the cryptographic module and reduced cost savings over having to purchase another cryptographic device with a different network interface for each desired application. Accordingly, even a selective combination of the cited references fails to disclose the claimed invention, recited in amended independent Claims 1, 11, 21, 25, and 29, for example.

Applicants further submit that the Examiner's combination of Dhir et al. and Cheng is improper, as a person having ordinary skill in the art would not turn to Cheng to combine with Dhir et al. to arrive at the claimed invention. More particularly, Dhir et al. is directed to a programmable integrated circuit for a WLAN. The communications module and the cryptographic module are purposely on a single FPGA (300) chip, as illustrated in Dhir et al. Combining Dhir et al. with Cheng so that the communications module and the cryptographic module would be removably coupled would require splitting the communications and cryptographic modules from the single FPGA.

Moreover, using Cheng as a motivation to modify Dhir et al. would result in breaking Dhir et al. between antenna 336 and WLAN transceiver 301, which is outside the FPGA chip and downstream from both the communications and cryptographic modules. This is because Cheng discloses removably coupling the communications modules to a connector portion, including a physical connector and antenna. Accordingly, even if there was

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some proper motivation to combine Dhir et al. and Cheng, the claimed invention is not produced because the removable coupling is not between the communications module and the cryptographic module.

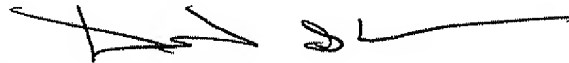
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**CONCLUSION**

In view of the amendments to the claims and the arguments provided herein, it is submitted that all the claims are patentable. Accordingly, a Notice of Allowance is requested in due course. Should any minor informalities need to be addressed, the Examiner is encouraged to contact the undersigned attorney at the telephone number listed below.

Respectfully submitted,



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